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Plaintiffs' Lead Counsel

*(Plaintiffs' Steering Committee Members Listed on
Signature Page)*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE CHRYSLER-DODGE-JEEP
ECODIESEL® MARKETING, SALES
PRACTICES, AND PRODUCTS
LIABILITY LITIGATION

MDL 2777 EMC

**STIPULATION AND ~~PROPOSED~~
ORDER TO EXTEND
PAGE LIMITS FOR CLASS
CERTIFICATION BRIEFING**
(modified)

The Honorable Edward M. Chen

This Document Relates to:

DORU BALI, *et al.*, on behalf of themselves and
all others similarly situated,

Plaintiffs,

v.

FIAT CHRYSLER AUTOMOBILES N.V., FCA
US LLC, SERGIO MARCHIONNE, VM MOTORI
S.p.A., VM NORTH AMERICA, INC., ROBERT
BOSCH GmbH, and ROBERT BOSCH LLC,

Defendants.

1 WHEREAS, under the Court-ordered schedule (Dkt. 300), Class Plaintiffs' Motion for
2 Class Certification is due on June 6, 2018; the oppositions of Defendants Fiat Chrysler
3 Automobiles N.V., FCA US LLC, Sergio Marchionne, VM Motori S.p.A., and VM North
4 America, Inc. (together, the "FCA Defendants") and Robert Bosch GmbH and Robert Bosch LLC
5 (together, the "Bosch Defendants") (collectively, "Defendants") are due on July 23, 2018; and
6 Class Plaintiffs' reply brief in support of their Motion is due on August 20, 2018;

7 WHEREAS, all parties believe that, to adequately address the relevant class certification
8 issues, they will require more pages than the default amount of pages permitted under the Local
9 Rules; and

10 WHEREAS, following a meet-and-confer process, the parties do not oppose and agree to
11 the page-limit extensions proposed herein.

12 IT IS THEREFORE STIPULATED AND AGREED by the Parties, through their
13 respective counsel of record, that, subject to the Court's approval, (1) Class Plaintiffs shall have
14 up to 50 pages for their brief in support of class certification; (2) the FCA Defendants and the
15 Bosch Defendants shall have up to 100 pages in the aggregate for their briefs in opposition to
16 class certification, to be divided between the FCA Defendants and the Bosch Defendants as
17 appropriate and to avoid duplication; and (3) Class Plaintiffs shall have up to 50 pages for their
18 reply in support of class certification.

19 **IT IS SO STIPULATED.**

20 Dated: June 5, 2018

Respectfully submitted,

21 LIEFF CABRASER HEIMANN & BERNSTEIN, LLP

22 By: /s/ Elizabeth J. Cabraser
23 Elizabeth J. Cabraser

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27 *Plaintiffs' Lead Counsel and Chair of the Plaintiffs' Steering*
28 *Committee*

1 Dated: June 5, 2018

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*Counsel for Fiat Chrysler Automobiles N.V., FCA US LLC,
Sergio Marchionne, V.M. Motori, S.p.A., and V.M. North
America, Inc.*

12 Dated: June 5, 2018

CLEARY GOTTlieb STEEN & HAMILTON LLP

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Counsel for Robert Bosch LLC and Robert Bosch GmbH

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ATTESTATION (CIVIL LOCAL RULE 5-1(i)(3))

In accordance with Civil Local Rule 5-1(i)(3), I attest the concurrence in the filing of this document has been obtained from the signatories.

Dated: June 5th, 2018

/s/ Elizabeth J. Cabraser
Elizabeth J. Cabraser

1 **~~PROPOSED~~ ORDER EXTENDING PAGE LIMITS**

2 Based on the foregoing Stipulation, the Court ORDERS as following:

3 (1) Class Plaintiffs shall have up to 50 pages for their brief in support of class
4 certification;

5 (2) the FCA Defendants and the Bosch Defendants shall have up to 75 pages in the
6 aggregate for their briefs in opposition to class certification, to be divided between the FCA
7 Defendants and the Bosch Defendants as appropriate and to avoid duplication; and

8 (3) Class Plaintiffs shall have up to 35 pages for their reply in support of class
9 certification.

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11 Dated: 6/5, 2018



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 5, 2018, a true and correct copy of the foregoing was electronically filed and served via the Court's CM/ECF system, which will automatically service notice to all registered counsel of record.

/s/ Elizabeth J. Cabraser
Elizabeth J. Cabraser